

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD. AND)	
SAMSUNG SEMICONDUCTOR, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-1453 (RGA) (JLH)
)	
NETLIST, INC.,)	
)	
Defendant.)	
NETLIST, INC.)	
)	
Counter-Plaintiff,)	
)	
v.)	
)	
GOOGLE LLC, ALPHABET INC.,)	
SAMSUNG ELECTRONICS CO., LTD. AND)	
SAMSUNG SEMICONDUCTOR, INC.,)	
)	
Counter-Defendants.)	

STIPULATION AND [PROPOSED] ORDER

WHEREAS, the Scheduling Order submitted by the parties and entered by the Court (D.I. 61) contains certain inconsistencies between the dates set forth in the body of the Scheduling Order and those set forth in the table of dates attached to the Scheduling Order, and certain other deadlines set forth in the Scheduling Order fall on federal holidays; and

WHEREAS, the parties wish to correct those inconsistencies and adjust the dates to avoid federal holidays;

IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, as follows:

1. The parties shall submit a proposed Protective Order for consideration by the Court (D.I. 61, ¶ 3) no later than December 27, 2022;

2. Netlist shall produce the file history for each asserted patent (*id.*, ¶ 7.a) no later than December 2, 2022;

3. The deadline for the parties to exchange their lists of claim terms/phrases that they believe need construction (*id.*, ¶ 11) shall be June 16, 2023;

4. The deadline for the parties to file their Joint Claim Construction Chart (*id.*, ¶ 11) shall be July 3, 2023; and

5. The deadline for Netlist to serve its opening claim construction brief (*id.*, ¶ 12) shall be July 18, 2023.

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November 30, 2022

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SO ORDERED this ____ day of _____, 2022.

J.